

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

State of Oklahoma, ex rel. W.W.A. Drew)	
Edmondson, in his capacity as Attorney)	
General of the State of Oklahoma and)	
Oklahoma Secretary of the Environment C.)	
Miles Tolbert, in his capacity as the Trustee)	
for Natural Resources for the State of)	
Oklahoma,)	05-CV-0329 GKF-SAJ
)	
Plaintiffs,)	
)	
v.)	
)	
Tyson Foods, Inc., Tyson Poultry, Inc., Tyson)	
Chicken, Inc., Cobb-Vantress, Inc., Aviagen,)	
Inc., Cal-Maine Foods, Inc., Cal-Maine)	
Farms, Inc., Cargill, Inc., Cargill Turkey)	
Production, LLC, George's, Inc., George's)	
Farms, Inc., Peterson Farms, Inc., Simmons)	
Foods, Inc., and Willow Brook Foods, Inc.,)	
)	
Defendants.)	
)	

MOTION FOR ADMISSION OF COUNSEL *PRO HAC VICE*

Come now the separate Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, by their attorneys Rhodes, Hieronymus, Jones, Tucker & Gable, PLLC, and pursuant to LCvR 83.2(g) and 83.3 move this Court for admission of Todd P. Walker to appear *pro hac vice* in this case as out-of-state counsel for Cargill, Inc. and Cargill Turkey Production, LLC, on the following grounds:

1. The undersigned John H. Tucker is counsel of record for Defendants Cargill, Inc. and Cargill Turkey Production, LLC in these proceedings. John H. Tucker will continue to serve as counsel to Defendants Cargill, Inc. and Cargill Turkey Production, LLC in these proceedings.

2. Pursuant to LCvR 83.2 (g), attached to this Motion as Exhibit 1 is the completed request form of Todd P. Walker.

3. Todd P. Walker is a member in good standing of the bar of Colorado. *See* Exhibit 1.

4. The proposed admittee understands that, upon admission *pro hac vice*, he shall be subject to the disciplinary jurisdiction of this Court.

5. The proposed admittee understands that admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

6. Submitted simultaneously with the filing of this motion is tender of the required \$75.00 fee to the Clerk of this Court.

WHEREFORE Defendants, Cargill, Inc. and Cargill Turkey Production, LLC respectfully request that this Court grant this application for out-of-state attorney Todd P. Walker to appear *pro hac vice* before this Court on behalf of Defendants Cargill, Inc. and Cargill Turkey Production, LLC, and enter the proposed Order submitted herewith.

Respectfully submitted,

RHODES, HIERONYMUS, JONES,
TUCKER & GABLE, PLLC

BY: s John H. Tucker (OBA #9110)
JOHN H. TUCKER, OBA #9110
COLIN H. TUCKER, OBA #16325
THERESA NOBLE HILL, OBA #19119
100 W. Fifth Street, Suite 400 (74103-4287)
P.O. Box 21100
Tulsa, Oklahoma 74121-1100
Telephone: 918/582-1173
Facsimile: 918/592-3390

And

DELMAR R. EHRICH

DARA D. MANN

FAEGRE & BENSON LLP

2200 Wells Fargo Center

90 South Seventh Street

Minneapolis, Minnesota 55402

Telephone: 612/766-7000

Facsimile: 612/766-1600

ATTORNEYS FOR CARGILL, INC. AND CARGILL TURKEY

PRODUCTION LLC

CERTIFICATE OF SERVICE

I certify that on the 1st day of October, 2007, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

W. A. Drew Edmondson, Attorney General
Kelly Hunter Burch, Assistant Attorney General
J. Trevor Hammons, Assistant Attorney General
Robert D. Singletary
Daniel Lennington, Assistant Attorney General

drew_edmondson@oag.state.ok.us
kelly_burch@oag.state.ok.us
trevor_hammons@oag.state.ok.us
Robert_singletary@oag.state.ok.us
Daniel.lennington@oag.ok.gov

Douglas Allen Wilson
Melvin David Riggs
Richard T. Garren
Sharon K. Weaver
Riggs Abney Neal Turpen Orbison & Lewis

doug_wilson@riggsabney.com
driggs@riggsabney.com
rgarren@riggsabney.com
sweaver@riggsabney.com

Robert Allen Nance
Dorothy Sharon Gentry
Riggs Abney

rnance@riggsabney.com
sgentry@riggsabney.com

J. Randall Miller
David P. Page
Louis W. Bullock
Miller Keffer & Bullock

rmiller@mkblaw.net
dpage@mkblaw.net
lbullock@mkblaw.net

William H. Narwold
Elizabeth C. Ward
Frederick C. Baker
Lee M. Heath
Motley Rice

bnarwold@motleyrice.com
lward@motleyrice.com
fbaker@motleyrice.com
lheath@motleyrice.com

COUNSEL FOR PLAINTIFFS

Stephen L. Jantzen
Patrick M. Ryan
Paula M. Buchwald
Ryan, Whaley & Coldiron, P.C.

sjantzen@ryanwhaley.com
pryan@ryanwhaley.com
pbuchwald@ryanwhaley.com

Mark D. Hopson
Jay Thomas Jorgensen
Timothy K. Webster
Sidley Austin LLP

mhopson@sidley.com
jjorgensen@sidley.com
twebster@sidley.com

Robert W. George
Michael R. Bond
Kutack Rock LLP

robert.george@kutackrock.com
michael.bond@kutackrock.com

**COUNSEL FOR TYSON FOODS, INC., TYSON POULTRY, INC., TYSON CHICKEN, INC.;
AND COBB-VANTRESS, INC.**

R. Thomas Lay
Kerr, Irvine, Rhodes & Ables

rtl@kiralaw.com

Jennifer S. Griffin
Lathrop & Gage, L.C.

jgriffin@lathropgage.com

COUNSEL FOR WILLOW BROOK FOODS, INC.

Robert P. Redemann
Lawrence W. Zeringue
David C. Senger
Perrine, McGivern, Redemann, Reid, Berry & Taylor, PLLC

rredemann@pmrlaw.net
lzingue@pmrlaw.net
dsenger@pmrlaw.net

Robert E. Sanders
E. Stephen Williams
Young Williams P.A.

rsanders@youngwilliams.com
steve.williams@youngwilliams.com

COUNSEL FOR CAL-MAINE FOODS, INC. AND CAL-MAINE FARMS, INC.

George W. Owens
Randall E. Rose
The Owens Law Firm, P.C.

gwo@owenslawfirmmpc.com
rer@owenslawfirmmpc.com

James M. Graves
Gary V. Weeks
Bassett Law Firm

jgraves@bassettlawfirm.com

COUNSEL FOR GEORGE'S INC. AND GEORGE'S FARMS, INC.

John R. Elrod
Vicki Bronson
Bruce W. Freeman
Conner & Winters, LLLP

jelrod@cwlaw.com
vbronson@cwlaw.com
bfreeman@cwlaw.com

COUNSEL FOR SIMMONS FOODS, INC.

A. Scott McDaniel
Nicole M. Longwell
Philip D. Hixon
Joyce, Paul & McDaniel, PC

smcdaniel@mhla-law.com
nlongwell@mhla-law.com
phixon@mhla-law.com

Sherry P. Bartley
Mitchell Williams Selig Gates & Woodyard
COUNSEL FOR PETERSON FARMS, INC.

sbartley@mws gw.com

Michael D. Graves
Dale Kenyon Williams, Jr.

mgraves@hallestill.com
kwilliams@hallestill.com

COUNSEL FOR CERTAIN POULTRY GROWERS

I also hereby certify that I served the attached documents by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

C. Miles Tolbert
Secretary of the Environment
State of Oklahoma
3800 North Classen
Oklahoma City, OK 73118
COUNSEL FOR PLAINTIFFS

Thomas C. Green
Sidley Austin Brown & Wood LLP
1501 K Street NW
Washington, DC 20005
**COUNSEL FOR TYSON FOODS, INC., TYSON
POULTRY, INC., TYSON CHICKEN, INC.; AND
COBB-VANTRESS, INC.**

s/ John H. Tucker (OBA #9110)